

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

**CRAIG E. TIMMONS,**

Debtor

Chapter 13

Case No. 20-10661-mdc

**WITHDRAWAL OF APPEARANCE OF JOSEPH P. SCHALK, ESQUIRE AND  
ENTRY OF APPEARANCE OF JOHN M. QUAIN, JR., ESQUIRE AND  
REQUEST FOR SERVICE OF PAPERS, RECEIPT OF  
NOTICES, AND INCLUSION ON NOTICE LIST**

TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE withdraw the appearance of Joseph P. Schalk, Esquire of Barley Snyder LLP in his representation of Fulton Bank, N.A., formerly known as Fulton Bank in the above-captioned matter.

PLEASE enter the appearance of John M. Quain, Jr., Esquire of Barley Snyder LLP on behalf of Fulton Bank, N.A., formerly known as Fulton Bank in the above-captioned matter.

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, our client respectfully requests that all notices given or required to be given in this case and in any adversary proceedings by the Court, the Debtor, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to the undersigned counsel at the addresses and to the persons, telephone numbers and telecopier set forth below. This request includes, without limitation, all orders,

notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

Fulton Bank, N.A., formerly known as Fulton Bank  
ATTN: John M. Quain, Jr., Esquire  
Barley Snyder LLP  
213 Market Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101  
Telephone No.: 717-231-6603  
Telecopier No.: 717--344-5373  
Email: [jquain@barley.com](mailto:jquain@barley.com)

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have orders in non-core matters entered only after de novo review by a District Judge, (ii) client's right to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments

to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

Barley Snyder LLP

By: /s/ Joseph P. Schalk, Esquire  
Joseph P. Schalk, Esquire  
Ct. I.D. No. 91656  
213 Market Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101  
717-231-6603

Barley Snyder LLP

By: /s/ John M. Quain, Jr., Esquire  
John M. Quain, Jr., Esquire  
Ct. I.D. No. 311983  
213 Market Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101  
717-231-6603

We hereby certify that copies of this Entry of Appearance were served by U.S. First Class Mail, postage prepaid, upon the following entities on the date hereof:

Debtor:  
Craig E. Timmons  
73 Norwood Road  
Downingtown, PA 19335

Chapter 13 Trustee  
William C. Miller, Esquire  
P.O. Box 1229  
Philadelphia, PA 19105

Debtor's Attorney:  
Robert J. Lohr, II, Esquire  
1246 West Chester Pike, Suite 312  
West Chester, PA 19382

U.S. Trustee:  
Office of the U.S. Trustee  
200 Chestnut Street, Suite 502  
Philadelphia, PA 19106

**AUGUST**  
DATED: ~~July~~ **5**, 2020